

GENERAL AREAS OF REVIEW

SFA:	School:
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REVIEW AREAS	YES	NO	N/A	COMMENTS
Free and Reduced Price Process 501. Is the policy statement implemented as approved? 502. Does the system as implemented (reviewer observation) prevent overt identification of students receiving free and reduced price benefits at meal service or at any other time? 503a. Does the LEA directly certify eligible children who are members of households receiving SNAP benefits for free meals as required? b. Are direct certifications made from match processes conducted a minimum of three times each school year? c. Is the LEA phasing out or not using a letter method as a primary method of direct certification for SNAP households? 504. Does the LEA directly certify foster children whose care and placement is the responsibility of the State or who are placed by a court with a caretaker household? 505. For direct certification with SNAP, FDPIR, or TANF and applications with case numbers, did the LEA extend categorical eligibility for free meals to all children in the family as defined in 7 CFR 245.2? 506. For household applications based on income eligibility, does the LEA only require the last four digits of the social security number of the adult household member signing the application? 507a. Did the LEA establish the verification sample pool based on the total number of approved applications on file as of October 1? b. Were the applications subject to verification properly selected in accordance with the sample size option used? c. Were no more/no less than the percentage/maximum number of applications for the sample size option used selected for verification? 508. If the LEA chose to replace applications selected for verification, was it done correctly and limited to 5% of the applications selected? 509a. If required, did the LEA conduct confirmation reviews?				

COORDINATED REVIEW EFFORT

[] NSLP [] SBP

[] SFA LEVEL

[] SCHOOL LEVEL

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<p>b. Did the LEA follow the required procedures if the confirmation review did not validate the original determination?</p> <p>510. Were households informed that acceptable documentation could be for any point in time between the month prior to application and the time the household is required to provide documentation?</p> <p>511. Did the LEA update its verification process to ensure social security numbers of each household member are not collected to verify applications?</p> <p>512. Did the LEA meet the follow-up requirements if the household failed to respond to the request for verification?</p> <p>513. Was verification completed by November 15 or was the LEA approved for an extension by the State agency?</p> <p>514a. Did the LEA attempt to directly verify selected applications?</p> <p>b. If YES, were the requirements met?</p> <p>515a. Was the verification process completed according to requirements?</p> <p><u>Provision 2, Provision 3 Only</u></p> <p>b. Is the school administering both the NSLP and SBP?</p> <p>c. If YES, is only one Program operating under Provision 2 or 3?</p> <p>d. If YES, has the non-Provision 2 or 3 conducted verification?</p> <p>516. Were letters of a potential reduction in benefits sent to families with students in this school as required?</p> <p>517. Were any applications denied incorrectly?</p> <p>Record errors on the Certification and Benefit Issuance Error Worksheet, S-5.</p>				

G-1 (continued)

INSTRUCTIONS FOR G-1

GENERAL AREAS OF REVIEW

Indicate by a check [✓] in the upper right hand corner of the form is being completed at the SFA level or the school level and the program being reviewed, SBP or NSLP.

Enter the name of the SFA. If the form is being completed at the SFA, indicate "N/A" in the "School" block. If the form is completed at the school level, enter the name of the school being reviewed in the "School" block. If a single school SFA is being reviewed, it is only necessary to complete one form.

The reviewer must answer the questions based on visual observation and/or written documentation as appropriate. All deficiencies and explanations must be described in the Comments section. SAs may develop their own administrative review forms for the general areas, as long as the forms include the scope of review defined in 210.18 and provisions in the Healthy, Hunger-Free Kids Act of 2010 as outlined in Forms and Instructions, G-1, G-2, and G-6.

FREE AND REDUCED PRICE PROCESS

School officials do not distribute applications, conduct direct certification, or make eligibility determinations of children in Provision 2 or Provision 3 schools in the non-base years for the meal services under Provision 2 or 3. (See Provision 2 Guidance, for exceptions to this general statement.)

- 501. Review copies of all letters/notices/forms used by the LEA/school in the application process to determine that they are those contained in the approved policy statement. Determine if procedures described in the policy statement to distribute and accept applications, collect payments from children, and conduct hearings are implemented as approved.
- 502. Observe and evaluate, where possible, aspects of the meal count/collection system to ensure that there is no overt identification of free and reduced price meal recipients.
- 503a. Determine if the LEA has a direct certification system in place and is properly certifying eligible children who are members of households receiving SNAP benefits for free meals without requiring further application.
 - b. Determine if the LEA's direct certification matching activities with SNAP meets the three times per school year minimum requirement.
 - c. Verify if the LEA is no longer using the letter method as the primary means of directly certifying children of SNAP households.
- 504. Ensure that the LEA is providing categorical eligibility for free meals without further application to any foster child whose care and placement is the responsibility of the State or who is placed by a court with a caretaker household.
- 505. Determine if the LEA is extending categorical eligibility to all children in a family, as defined in 7 CFR part 245.2, receiving assistance from SNAP, FDPIR, or TANF Program.
- 506. Ensure that LEA only requires the last four digits of the social security number of the adult household member signing the application.
- 507a. Determine the total number of applications on file as of October 1. Determine if the LEA was qualified to use the alternative sample size, including notifying the State agency and following any State specific procedures.
 - b. Based on the sample size used, determine if error prone applications were initially selected as required, and if random sampling, as needed, was properly conducted.
 - c. Determine how many applications (based on the percentage up to the maximum) should have been verified based on the alternate used.
- 508. Determine if no more than 5% of applications selected for verification were replaced and determine if applications removed from the sample were selected on a case-by-case basis.
- 509a. Determine if the LEA was required to do confirmation reviews or if the LEA had State agency approval to waive confirmation reviews.
 - b. Determine if the confirmation reviews meet the requirements in the Eligibility Manual for School Meals.

INSTRUCTIONS FOR G-1 (continued)

- 510. Review the notification letter for this information.
- 511. Ensure that the LEA updated its verification process to not require the households to provide social security numbers to verify applications.
- 512. Review the applications selected for verification to determine if follow-up action was required and was taken in accordance with requirements.
- 513. Self-explanatory.
- 514a. Determine if the LEA used direct verification.
 - b. If direct verification was used, determine if the requirements in Part 9 of the Eligibility Manual for School Meals were met.
- 515a. Evaluate the verification process to determine if all requirements are met. For additional information, refer to Eligibility Manual for School Meals, parts 8 and 9, issued in 2008.

For Provision 2/- 3 schools, it will be necessary to determine if Provision 2/3 is administered for the School Breakfast Program only, the National School Lunch Program only, or for both the SBP and NSLP.

Parts b, c. and d. are for Provision 2/ 3 schools only.

- 515b. If the school administers both the NSLP and SBP and both of the Programs are operating under Provision 2/ 3, the school is not subject to verification in the non-base years.
 - c. If the school administers one Program (NSLP or SBP) and that Program is operating under Provision 2/3, the school is not subject to verification in the non-base years.
 - d. If the school is administering both the NSLP and SBP but only one of those Programs is operating under Provision 2/3, the school is subject to verification annually for the non-Provision 2/3 Program.
- 516. Determine if the LEA provided written notice to households 10 calendar days prior to the reduction or termination of benefits and if the notice included appeal procedures. The first day of the 10-day period is the day the notice is sent.
- 517. Review any applications where meal benefits were denied during the application approval process for this school. At a minimum, a representative sample of denied applications must be reviewed. Record errors on the Certification and Benefit Issuance Error Worksheet, S-5.

GENERAL AREAS OF REVIEW

SFA:	School:
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REVIEW AREAS	YES	NO	N/A	COMMENTS
Civil Rights				
601. Is a USDA/FNS approved poster displayed in a prominent place and visible to recipients?				
602. Is the correct nondiscrimination statement included on appropriate program materials?				
603a. Has the SFA or State sent out a public release to community/grassroots organizations?				
b. For Provision 2/3 schools, was it a simplified public release stating that nutritious meals are served to all children at no cost?				
604. Are bilingual services (translators and materials) available for the Limited English Proficiency (LEP) population?				
605a. Are procedures established to receive complaints alleging discrimination?				
b. Have there been any written or verbal complaints alleging discrimination?				
c. If YES, have these complaints been reported to the State agency?				
606. Are Program benefits made available and provided to all children without discrimination on the basis of their race, color, national origin, sex, age, or disability?				
607. Are incorrectly denied free and reduced price applications disproportionately composed of minority applications?				
608. Are students with special dietary needs provided program benefits as prescribed by regulations?				
609. Does the LEA provide annual training to staff dealing directly with program applicants and participants?				
610a. Does the LEA collect racial/ethnic data for program applicants and participants on a yearly basis?				
b. If NO, explain in the comments section.				

INSTRUCTIONS FOR G-2

CIVIL RIGHTS

Civil Rights requirements are outlined in FNS Instruction 113-1, *Civil Rights Compliance and Enforcement – Nutrition Programs and Activities*, dated November 8, 2005.

For all other FNS nutrition assistance programs, State or local agencies, and their subrecipients, must post the following nondiscrimination statement:

The U.S. Department of Agriculture prohibits discrimination against its customer, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal, and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases will apply to all programs and/or employment activities.)

If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, or any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 200250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.

Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish).

USDA is an equal opportunity provider and employer.

601 - 610.

Determine, based on the answers to the questions in this section, if program benefits are made available and provided to all children without discrimination on the basis of their race, color, national origin, sex, age, or disability, and that the SFA seeks to reach all portions of the population.

The USDA Departmental Policy staff is currently reviewing and updating the non-discrimination policy statement that includes the filing address, contact phone numbers and Federal Relay Service number. Until such time that the updated non-discrimination statement has been approved by USDA, the following information statement must be used:

Question 603b is for Provision 2 or 3 schools only.

603b. For Provision 2 and 3 schools, the school food authority must continue to notify the public that nutritious meals are available at school, but may use a simplified public release for the schools operating under one of the Provisions. Since all meals are served to children at no charge, there are no meal charges or free and reduced price meal eligibility criteria to announce.

GENERAL AREAS OF REVIEW

SFA:	School:
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REVIEW AREAS	YES	NO	N/A	COMMENTS
Monitoring Responsibilities				
701a. Was the on-site review of the meal counting and claiming procedure completed prior to February 1?				
b. Was corrective action of the meal counting and claiming procedure required?				
c. If YES, was a follow-up review conducted within 45 days to ensure that the school implemented corrective action?				
d. Does documentation indicate that corrective action was successful?				
702a. Prior to the submission of a claim, are attendance adjusted eligibles (or an alternate approved by the State agency) by category compared to daily meal counts for each school?				
b. Have daily counts that exceed the attendance adjusted eligible edit check (or alternate approved by the State agency) been evaluated prior to consolidation?				
c. If NO to a or b, explain.				
<u>Provision 2 or 3 Only</u>				
d. Prior to the submission of a claim for reimbursement, is attendance adjusted enrollment compared to the total daily meal count for each school during the review month?				
e. Have daily counts for the review month that exceeded the attendance adjusted enrollment edit check been evaluated prior to consolidation?				
f. If NO to d or e, explain.				

INSTRUCTIONS FOR G-3

MONITORING RESPONSIBILITIES

- 701a. Examine the documentation of the on-site review of the reviewed school to determine if the SFA had monitored the reviewed school's counting and claiming procedures by February 1.
 - b. Determine if there were errors in the meal counting and claiming procedures for the reviewed school that required corrective action.
 - c. If errors were identified in the meal counting and claiming procedures for the reviewed school, determine if an on-site follow-up review was conducted within 45 days to ensure that corrective action was implemented.
 - d. Review documented corrective action to determine if deficiencies cited were successfully corrected.
- 702a. Determine if a comparison is made of each reviewed school's daily free, reduced price, and paid meal counts to the number of children currently eligible for free, reduced price, and paid meals, respectively, times an attendance factor prior to the submission of a Claim for Reimbursement. If a comparison is made using an alternate method, describe the method used in the Comments section.
 - b. Determine if the SFA has evaluated the daily counts for the review month for reasonableness prior to consolidation if they exceed the attendance adjusted eligible edit check.
 - c. If the comparison or evaluation has not been done prior to the consolidation of the claim, describe why.

Parts d, e and f are for Provision 2 or 3 schools only.

- d. Determine if a comparison is made of each reviewed school's total daily enrollment (students with access to the NSLP) times an attendance factor prior to the submission of a Claim for Reimbursement.
- e. Determine if the SFA has evaluated the daily counts for the review month for reasonableness prior to consolidation if they exceed the attendance adjusted enrollment (students with access to the NSLP) edit check.
- f. If the comparison or evaluation has not been done prior to the consolidation of the claim, describe why.

COORDINATED REVIEW EFFORT

☐ NSLP ☐ SBP

☐ SFA LEVEL

GENERAL AREAS OF REVIEW

☐ SCHOOL LEVEL

SFA:	School:
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REVIEW AREAS	YES	NO	N/A	COMMENTS
Reporting and Recordkeeping 801. Were reports submitted as required to the State agency? 802. Are records retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits?				
Food Safety and Sanitation 901a. Is a written food safety program in place? <div style="margin-left: 20px;">b. Does the program follow USDA guidance?</div> <div style="margin-left: 20px;">c. Do observations on day of review indicate principles of the program are being implemented?</div> <div style="margin-left: 20px;">d. If NO to a, b or c, explain.</div> 902a. Has the site received two food safety inspections during the current school year? <div style="margin-left: 20px;">b. If NO, explain.</div> <div style="margin-left: 20px;">c. If NO, were two food safety inspections conducted in the previous school year?</div> <div style="margin-left: 20px;">d. If two inspections were not conducted in the current or prior school year, did the SFA/school request the inspections?</div> <div style="margin-left: 20px;">e. IF NO, explain.</div> 903. Is the most recent food safety inspection report posted in a publicly visible location?				

INSTRUCTIONS FOR G-4

REPORTING AND RECORDKEEPING

- 801. Determine if the SFA prepares and submits reports as required. (See 7 CFR 210.20 for reporting and recordkeeping requirements).
- 802. Determine if the school/SFA is retaining the appropriate records regarding program management for 3 years after the final Claim for Reimbursement for the fiscal year or until resolution of any audits.

FOOD SAFETY AND SANITATION

- 901a. Review documentation to determine if a food safety program is in place at the school site.
 - b. Determine if the program follows the USDA guidance. For additional information, refer to *Guidance for School Food Authorities: Developing a Food Safety Program Based on the Process Approach to HACCP Principles*, United States Department of Agriculture, Food and Nutrition Service, June 2005.
 - c. Determine if observations on the day of review indicate the program principles are being implemented as planned at the school site.
 - d. If NO to a, b or c, describe the problems.
- 902a. Examine documentation from food safety inspections. Answer YES if the site has received two food safety inspections in the current school year. Answer NO if less than two food safety inspections are available for the current school year. Record the dates of the inspections in the Comments section. (Depending upon the timing of the CRE, safety inspections could be planned for later in the school year).
 - b. If the site has not had two safety inspections, record the reason(s) why.
 - c. If the site did not have two food safety inspections in the current school year, determine if the site had two food safety inspections in the previous school year. Answer YES if the site has received two food safety inspections in the previous school year. Record the dates of the inspections in the Comments section. Answer NO if less than two food safety inspections were conducted in the previous school year.
 - d. Document actions taken by SFA to request food safety inspections from the state or local food safety inspection authority.
 - e. If the SFA/school did not request the food safety inspections, obtain and record the reasons why.
- 903. Determine if the most recent food safety inspection report is posted in a publicly visible location.

COORDINATED REVIEW EFFORT

☐ NSLP ☐ SBP

☐ SFA LEVEL

GENERAL AREAS OF REVIEW

☐ SCHOOL LEVEL

SFA:	School:
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REVIEW AREAS	YES	NO	N/A	COMMENTS
Local Wellness Policy 1001. Has the LEA established a local wellness policy for all schools and is it available? 1002. Does the policy include at a minimum, a. The involvement of students, parents, school food authority, school board members, and the public in the development of the plan? b. Goals for nutrition education, physical activity, and other school-based activities that promote student wellness? c. Nutrition guidelines for all foods available on each school campus during the school day that promote student health and reduce childhood obesity? d. A plan for measuring implementation of the policy? e. Designation of one or more persons charged with operational responsibility? 1003. Is the LEA moving towards strengthening local wellness policies, by a. Making efforts to include teachers of physical education, school health professionals, and school administrators in the development, implementation, and periodic review and update of the policy? b. Expanding the scope of the local wellness policy to include nutrition promotion? c. Informing and updating the public (including parents, students, and community) about the content and implementation of the policy?				
Water 1101. Is potable water available to children at no charge during the meal service where lunch meals are served?				
Paid Lunch Pricing 1201. Are records available documenting the SFAs efforts to meet paid lunch pricing requirements? 1202. Does the documentation include the source of non-federal funds, if applicable? 1203. Are paid lunch prices consistent with USDA requirements? If not, is there a plan in place to bring paid lunch pricing into compliance? 1204. Has the SFA submitted paid lunch pricing information to the State agency?				

COORDINATED REVIEW EFFORT

☐ NSLP ☐ SBP☐ SFA LEVEL

GENERAL AREAS OF REVIEW

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SFA:	School:
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REVIEW AREAS	YES	NO	N/A	COMMENTS
Revenue from Nonprogram Foods If the SFA sells nonprogram foods: 1301. Are records available documenting the SFAs efforts to meet nonprogram food cost and revenue requirements? 1302. Does the SFA nonprogram food pricing meets USDA requirements? If not, has the SFA developed a plan to meet the revenue requirements? 1303. Does the SFA have documentation demonstrating that all revenue from the sale of nonprogram foods accrues to the nonprofit school food service account?				

G-5 (continued)

INSTRUCTIONS FOR G-5

LOCAL WELLNESS POLICY

1001. Request a current copy of the local school wellness policy to determine that a policy has been established and is easily accessible.
1002. Review the policy to determine if the policy includes:
 - a. The involvement of students, parents, school food authority, school board members, and the public in the development of the plan;
 - b. Goals for nutrition education, physical activity, and other school-based activities that promote student wellness;
 - c. Nutrition guidelines for all foods available on each school campus during the school day that promote student health and reduce childhood obesity;
 - d. A plan for measuring implementation of the policy; and
 - e. Designation of one or more persons charged with operational responsibility.
1003. Determine if the LEA is moving towards strengthening local wellness policies by:
 - a. Making efforts to include PE teachers, school health professionals, and school administrators in the development, implementation, and periodic review and update of the policy;
 - b. Expanding the scope of the policy to include nutrition promotion; and
 - c. Informing and updating the public (including parents, students, and community) about the content and implementation of the policy.

WATER

1101. Determine if potable water is available to children at no charge during the meal service where lunch meals are served.

PAID LUNCH PRICING

1201. Request documentation to verify that the SFA is in compliance with the paid lunch pricing requirements.
1202. Assess the documentation to determine if non-Federal funds were used and if used, whether the funds are from allowable non-Federal sources.
1203. Determine if the SFA paid lunch pricing meets USDA requirements. If not, is there a plan in place to bring paid lunch pricing into compliance?
1204. Determine if the SFA submitted paid lunch pricing to the State agency as required.

INSTRUCTIONS FOR G-5 (continued)

REVENUE FROM NONPROGRAM FOODS

- 1301. Request documentation to verify that the SFA used a clear methodology to determine compliance with nonprogram food cost and revenue requirements.
- 1302. Assess whether the SFA nonprogram foods pricing meets USDA requirements. If not, has the SFA developed a plan to meet the revenue requirements?
- 1303. Assess documentation to determine if all nonprogram food revenue was added to the nonprofit school food service account.

COORDINATED REVIEW EFFORT

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GENERAL AREAS OF REVIEW

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SFA:	School:
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REVIEW AREAS	YES	NO	N/A	COMMENTS
<p>Smart Snacks in School</p> <p>1401. Is the SFA's food sale practice consistent with its policies including the selling of non-food items in combination with food items?</p> <p>1402. Does the SFA have a process in place to determine compliance with non-packaged or recipe (combination foods that do not label) food items?</p> <p>1403. Does the SFA account for accompaniments when determining whether food items meet Smart Snack standards?</p> <p>1404. Are foods available in the following locations during the school day? If so, which entity (SFA or LEA) is responsible for the location?</p> <ul style="list-style-type: none"> - Cafeteria - Vending Machines - School Store(s) - Snack/Coffee Bar - Concession Stand - Other (please specify in comment box) <p>1405. Do foods/beverages sold to students during the school day (defined as 12am on a day of instruction to 30 minutes after the end of the official school day), including a la carte foods/beverages sold during meal services, meet Smart Snacks standards?</p> <p>1406. If mixed grades, do beverages meet requirements for the youngest age?</p> <p>1407. Does the school hold fundraisers? If so, did schools observe the State-defined limit on fundraisers?</p> <p>1408. Are exempt leftover NSLP entrees only sold the same day, or the day after, they are initially offered?</p>				

INSTRUCTIONS FOR G-6

SMART SNACKS IN SCHOOL

1401. Obtain a copy of the SFA's food sale policy and evaluate its implementation of the food sale policy including the sale of non-food items in combination with food items to ensure compliance.
1402. Evaluate the SFA's process for determining compliance with non-packaged or recipe (combination foods that do not label) food items (§210.11(c)).
1403. Evaluate the SFA's process to account for accompaniments when determining whether food items meet the Smart Snack standards (§210.11(l)).
1404. Observe all locations where students are able to purchase foods and beverages during the school day. Determine which entity (LEA or SFA) is responsible for the location.
1405. Obtain the time when foods and beverages are sold to students during the school day (defined as 12 am on a day of instruction to 30 minutes after the end of the official school day) (§210.11(a)(5) and §210.11(b)(3)).
1406. If the school enrollment includes mixed grades, determine if the beverages meet the requirements for students in the youngest age/grade group (§210.11(m)).
1407. Review the food sales policies to determine if schools hold fundraisers. If yes, determine if the schools observe the State-defined limit on fundraisers. For non-exempt fundraisers, determine if these meet the Smart Snack standards (§210.11(b)(4)).
1408. Obtain copies of production records to determine if exempt leftover NSLP entrees are only sold the same day, or the day after, they are initially offered (§210.11(b)(2) and §210.11(c)(3)).